



TELEPHONE

**Certification of CPNI Filing
February 6, 2006**

EB-06-TC-060

I, Kim Collins, hereby certify this 6th day of February, 2006 that I am an officer of Cross Telephone Company, Inc. and that I have personal knowledge that Cross Telephone Company, Inc. has established operating procedures that are to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

Kim Collins

Officer's Name

Assistant Secretary

Title

A handwritten signature in black ink, appearing to read "Kim Collins", written over a horizontal line.

Signature

02/03/06

Date



TELEPHONE

**Cross Telephone Company, INC.
STATEMENT OF COMPLIANCE WITH CPNI
47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2009**

Cross Telephone Company, Inc. (Cross) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- Cross has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. Cross has established disciplinary procedures for any employee that wrongfully discloses CPNI. We also ensure that our vendors that have access to our customers CPNI are aware of the CPNI rules.
- Cross does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2009. Cross provides either an opt-in notice or an opt-out notice when appropriate and maintains the customers choice. Therefore, the customers approval status can be determined prior to use of CPNI.
- Cross maintains records of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Also, Cross maintains records everytime third parties are allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- Cross requires sales personnel to obtain supervisor approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- Cross will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customers inability to opt-out is more than an anomaly.